

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>IN RE:</b>	:	<b>CASE NO.: 15-51527</b>
	:	
<b>BOBST COLLISION, INC.</b>	:	<b>CHAPTER: 11</b>
	:	
<b>Debtor.</b>	:	<b>JUDGE: HOFFMAN</b>

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**OBJECTION TO PROOF OF CLAIM**  
**OF STATE OF OHIO, DEPARTMENT OF TAXATION (CLAIM # 5)**

Now comes Debtor, **Bobst Collision, Inc.**, by and through counsel, and hereby objects to **Claim #5** filed by **State of Ohio, Department of Taxation** whose address is **Ohio Department of Taxation, Bankruptcy Division, P.O. Box 530, Columbus, OH 43216**. Said claim was filed on **July 21, 2015** in the amount of **\$287,209.23**.

The Debtor **OBJECTS** to the claim as to **\$250,000.00** portion of the Proof of Claim for the reasons set forth more fully in the attached Memorandum in Support.

Respectfully submitted,

/s/ Garry A. Sabol  
Garry A. Sabol (0002004)  
Attorney for Debtor  
1530 Demorest Drive  
Columbus, OH 43228  
(614) 871-8970  
(614) 871-5297 FAX  
[sabolg@yahoo.com](mailto:sabolg@yahoo.com)

**MEMORANDUM IN SUPPORT**

The Debtor has made substantial payments to the State of Ohio, Department of Taxation which the Debtor believes are not reflected in the Proof of Claim and Debtor is also questioning the breakdown as to taxes owed, penalty and interest assessed.

For the reasons set forth above it is respectfully requested that Debtor's Objection to Proof of Claim of State of Ohio, Department of Taxation (Claim #5) be sustained.

Respectfully submitted,

/s/ Garry A. Sabol  
Garry A. Sabol (0002004)  
Attorney for Debtor

**NOTICE OF OBJECTION TO CLAIM**

The Debtor has filed an Objection to your claim in this bankruptcy case.

**Your claim may be reduced, modified or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.**

If you do not want the Court to reduce, modify or eliminate your claim, then on or before **thirty (30) days** from the date set forth in the certificate of service for objection to claim, you or your attorney must:

File with the Court a written response to the Objection, explaining your position, at:

**Clerk, U.S. Bankruptcy Court  
170 N. High Street  
Columbus, OH 43215**

The Court must **receive** your response on or before the above date. If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before thirty (30) days from the date below.

You must also mail a copy to:

**Garry A. Sabol, Esq.  
1530 Demorest Road  
Columbus, OH 43228**

**United States Trustee  
170 N. High Street, Suite 200  
Columbus, OH 43215**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the objection to your claim and may enter an order reducing, modifying or eliminating your claim without further notice.

Dated: March 11, 2016

\_\_\_\_\_  
/s/ Garry A. Sabol  
Garry A. Sabol (0002004)  
Attorney for Debtor

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the attached Objection to Proof of Claim and Notice was served this date on the parties whose names and addresses are listed below by regular U.S. mail, postage prepaid, or electronically through the Court's ECF System that a request for relief has been filed with the Court.

Dated: March 11, 2016

/s/ Garry A. Sabol  
Garry A. Sabol (0002004)  
Attorney for Debtor

**by electronic mail to:**

Office of the U.S. Trustee @ [Jeremy.S.Flannery@usdoj.gov](mailto:Jeremy.S.Flannery@usdoj.gov)

Bayview Loan Servicing, LLC @ [bknotice@johndclunk.com](mailto:bknotice@johndclunk.com)

Internal Revenue Service @ [USAOHS.ECFColBank@usdoj.gov](mailto:USAOHS.ECFColBank@usdoj.gov)

Ohio Department of Taxation @ [bgianangeli@mifsudlaw.com](mailto:bgianangeli@mifsudlaw.com)

**By regular U.S. Mail, postage pre-paid:**

Bobst Collision, Inc.  
2918 Parsons Avenue  
Columbus, OH 43207-3053

City of Columbus  
Income Tax Division  
50 W. Gay Street, 4<sup>th</sup> floor  
Columbus, OH 43215-9037

State of Ohio, Bureau of Workers Comp  
c/o Ohio Attorney General  
150 E. Gay Street  
Columbus, OH 43215

State of Ohio, Dept. of Jobs & Family  
c/o Ohio Attorney General  
150 E. Gay Street  
Columbus, OH 43215

The United States of America  
c/o U.S. Attorney General  
950 Pennsylvania Avenue NW  
Washington, D.C., 20530

Sandra E. Bobst  
480 Grebus Road  
Columbus, OH 43207

CAN Capital Management Services  
2015 Vaughn Road N.W.  
Suite 500  
Kennesaw, GA 30144-7831

City of Columbus  
Income Tax Division  
77 N. Front Street, 2<sup>nd</sup> floor  
Columbus, OH 43215

Huntington National Bank  
c/o Lea Downward  
2361 Morse Road  
Columbus OH 43229

Department of the Treasury  
Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Ohio Bureau of Workers' Compensation  
P.O. Box 15567  
Columbus, OH 43215-0567

Ohio Department of Taxation  
Bankruptcy Division  
P.O. Box 530  
Columbus, OH 43216

/s/ Garry A. Sabol (0002004)  
Garry A. Sabol  
Attorney for Debtor